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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. 3:18-cr-494 EMC
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE AND EXCLUDE TIME
v.)	
)	
MARIA ROSARIO ESCOBAR DAVILA,)	
)	
Defendant.)	
)	

This matter is currently set for a status conference on August 24, 2022. The parties are actively working towards a resolution and need more time to finalize the parameters of an agreement. The parties agree that a continuance of the status conference is necessary to allow necessary time to work towards resolution. Moreover, the parties are optimistic that a resolution will occur at the next calling of the case. The parties are therefore requesting that the case be continued to September 21, 2022 for a further status conference.

The parties also agree that the additional time is necessary for the effective preparation of counsel and continuing pretrial investigation and exchange of discovery. Therefore, the parties jointly request that the time between August 24, 2022 and September 21, 2022 be excluded in order to provide

STIPULATION AND ~~PROPOSED~~ ORDER
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1 reasonable time necessary for the effective preparation of counsel pursuant to 18 U.S.C. §
2 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting the continuance
3 outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),
4 (B)(iv).

5
6 IT IS SO STIPULATED.

7 DATED: August 23, 2022

Respectfully Submitted,

8 STEPHANIE M. HINDS
9 Acting United States Attorney

10 /s/ Charles Bisesto
11 CHARLES F. BISESTO
Assistant United States Attorney

12 /s/ Daniel Blank
13 DANIEL BLANK
14 Attorney for Defendant Maria Escobar Davila

~~PROPOSED~~ ORDER

For the reasons stated above, the Court continues the status conference date from August 24, 2022 to September 21, 2022 and finds that the exclusion of time from August 24, 2022, through and including September 21, 2022, is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny effective preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. §§ 3161 (h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: August 23, 2022


HONORABLE EDWARD M. CHEN
United States District Court Judge